

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

Cr. No. H-23-0413

ABIGAIL JO SHRY

SECOND UNOPPOSED MOTION TO CONTINUE

Defendant, Abigail Jo Shry, moves this Court for a 90-day continuance of all dates, and she respectfully shows as follows:

Ms. Shry is charged with threat by interstate communication in violation of 18 U.S.C. § 875(c). The pretrial motions deadline was January 24, 2024; the pre-trial conference is set for February 21, 2024, at 10:30 a.m., and jury trial is set for February 26, 2024, at 9:00 a.m.

Counsel has received discovery and needs additional time to review and investigate. Undersigned counsel has identified certain legal and factual issues that require further investigation. Counsel needs more time to complete his investigation and analysis, and then to file pretrial motions, if necessary, and to prepare for trial, if necessary. Moreover, additional time is needed to discuss the case with Ms. Shry.

The defendant respectfully submits that the best interests of justice served by granting this motion for a continuance substantially outweigh the interests of the defendant and the community in a speedy trial, and that failure to grant the

continuance would deprive defense counsel of sufficient time to prepare for trial.

The government is unopposed to this second motion to continue.

Respectfully submitted,

MARJORIE A. MEYERS
Federal Public Defender
Southern District of Texas No. 3233
Texas State Bar No. 14003750

By /s/ Amr A. Ahmed
AMR A. AHMED
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CERTIFICATE OF CONFERENCE

I certify that I conferred with Assistant United States Attorney Richard Hanes and determined that the United States is unopposed to this second motion to continue.

By /s/ Amr A. Ahmed
AMR A. AHMED

CERTIFICATE OF SERVICE

I certify that on January 30, 2024, a copy of the foregoing was served by Notification of Electronic Filing and will be delivered by email to the office of Assistant United States Attorney Richard Hanes.

By /s/ Amr A. Ahmed
AMR A. AHMED